

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT COURT OF MASSACHUSETTS**

Ina Steiner,
David Steiner,
Steiner Associates, LLC,

Plaintiffs,

v.

eBay, Inc., et al.,
,

Defendants.

No. 1:21-cv-11181-PBS

**ANSWER AND
AFFIRMATIVE
DEFENSES OF
DEFENDANT DEVIN
WENIG**

Defendant Devin Wenig, by and through his counsel, hereby respectfully submits his Answer responding, by corresponding paragraph numbers, to each of the numbered paragraphs in the First Amended Complaint of Ina Steiner, David Steiner, and Steiner Associates, LLC, (“Plaintiffs”). Mr. Wenig denies each and every allegation in the First Amended Complaint, except as hereinafter specifically admitted, qualified, or otherwise answered. Mr. Wenig hereby states as follows:

INTRODUCTION

1. Mr. Wenig admits that eBay is a multinational *Fortune 500* Company, but lacks information sufficient to admit or deny eBay’s market value and otherwise denies the allegations in Paragraph 1.

2. Mr. Wenig denies the allegations in Paragraph 2, except he admits that Ina and David Steiner are affiliated with EcommerceBytes, which posts information about various e-commerce companies, including eBay.

3. Mr. Wenig admits that he was the Chief Executive Officer of eBay, that Steven Wymer was the Senior Vice President and Chief Communications Officer of eBay, and that Defendant Wendy Jones was the Senior Vice President of Global Operations at eBay and otherwise denies the allegations in Paragraph 3.

4. Mr. Wenig denies the allegations in Paragraph 4. To the extent that the allegations in Paragraph 4 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 4. To the extent that the allegations in Paragraph 4 purport to characterize documents, those documents speak for themselves. To the extent that Paragraph 4 asserts legal arguments and conclusions of law, no response is required.

5. Mr. Wenig denies the allegations in Paragraph 5, to the extent they relate to him. To the extent that the allegations in Paragraph 5 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 5.

6. Mr. Wenig denies the allegations in Paragraph 6, to the extent they relate to him. To the extent that the allegations in Paragraph 6 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 6.

7. Mr. Wenig denies the allegations in Paragraph 7, to the extent they relate to him. To the extent that the allegations in Paragraph 7 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 7.

8. To the extent that the allegations in Paragraph 8 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 8. To the extent the allegations in Paragraph 8 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 8.

9. The allegations in Paragraph 9 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 9.

10. To the extent that the allegations in Paragraph 10 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 10. To the extent the allegations in Paragraph 10 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 10.

11. To the extent that the allegations in Paragraph 11 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 11. To the extent the allegations in Paragraph 11 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 11.

12. Mr. Wenig admits that Defendants Cooke, Gilbert, Popp, Stockwell, and Zea pleaded guilty to certain charges and that Defendants Baugh and Harville were indicted on certain charges. To the extent the allegations in Paragraph 12 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 12.

13. Mr. Wenig admits that Defendant Wymer was hired as Senior Vice President and Chief Communications Officer of eBay and was terminated by eBay, but denies the remaining allegations relating to Defendant Wymer. To the extent that the allegations in Paragraph 13 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 13. To the extent the allegations in Paragraph 13 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 13.

14. Mr. Wenig admits that he departed from eBay. To the extent the allegations in Paragraph 14 are based on a document, that document speaks for itself and all characterizations thereof are denied. To the extent that the allegations in Paragraph 14 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 14.

15. Mr. Wenig denies the allegations in Paragraph 15, to the extent they relate to him. To the extent that Paragraph 15 asserts legal arguments and conclusions of law, no response is required. To the extent that the allegations in Paragraph 15 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 15.

16. To the extent that Paragraph 16 asserts legal arguments and conclusions of law, no response is required. To the extent that the allegations in Paragraph 16 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the

allegations in Paragraph 16. Mr. Wenig denies the remaining allegations in Paragraph 16, to the extent they relate to him.

17. To the extent that Paragraph 17 asserts legal arguments and conclusions of law, no response is required. Further, the allegations in Paragraph 17 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 17.

18. Mr. Wenig admits that Plaintiffs brought this lawsuit and are seeking damages, but denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 18.

JURISDICTION AND VENUE

19. Mr. Wenig admits that he is a citizen of California. To the extent that the allegations in Paragraph 19 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 19. Further, Paragraph 19 asserts legal arguments and conclusions of law, and no response is required.

20. Paragraph 20 asserts legal arguments and conclusions of law, and no response is required.

21. Paragraph 21 asserts legal arguments and conclusions of law, and no response is required.

22. Paragraph 22 asserts legal arguments and conclusions of law, and no response is required.

THE PARTIES

23. The allegations in Paragraph 23 relate to other parties, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 23.

24. The allegations in Paragraph 24 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 24.

25. Mr. Wenig admits that eBay, Inc. is a Delaware corporation with its headquarters in San Jose, California.

26. Mr. Wenig admits that eBay, Inc. is a multinational commerce corporation that facilitates online sellers and buyers through its website. To the extent that the allegations in Paragraph 26 are based on third-party publications, those publications speak for themselves and all characterizations thereof are denied.

27. The allegations in Paragraph 27 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 27.

28. Mr. Wenig admits that he was formerly eBay's Chief Executive Officer. Mr. Wenig further admits that he resides in Los Altos Hills, California, and holds a Juris Doctor from Columbia Law School. Mr. Wenig admits that he is admitted to the bar in New York, but denies that his membership is active.

29. Mr. Wenig admits that Steve Wymer was eBay's former Senior Vice President and Chief Communications Officer. The remaining allegations in Paragraph 29 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 29.

30. Mr. Wenig admits that Wendy Jones was eBay's former Senior Vice President of Global Operations. The remaining allegations in Paragraph 30 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 30.

31. The allegations in Paragraph 31 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 31.

32. Mr. Wenig admits that Jim Baugh was eBay's former Senior Director of Safety & Security and that he is currently incarcerated. The remaining allegations in Paragraph 32 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 32.

33. The allegations in Paragraph 33 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 33.

34. The allegations in Paragraph 34 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 34.

35. The allegations in Paragraph 35 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 35.

36. The allegations in Paragraph 36 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 36.

37. The allegations in Paragraph 37 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 37.

38. The allegations in Paragraph 38 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 38.

39. The allegations in Paragraph 39 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 39.

40. Mr. Wenig denies the allegations in Paragraph 40, except admits that Defendant Jones and Defendant Wymer reported to Mr. Wenig concerning matters within their job responsibilities. To the extent that the allegations in Paragraph 40 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 40. To the extent that the allegations in Paragraph 40 assert legal arguments and conclusions of law, no response is required.

41. Paragraph 41 asserts legal arguments and conclusions of law, and no response is required.

THE FACTS

42. The allegations in Paragraph 42 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 42.

43. The allegations in Paragraph 43 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 43.

44. The allegations in Paragraph 44 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 44.

45. The allegations in Paragraph 45 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 45. Further, to the extent that the allegations in Paragraph 45 appear to be based on publications, those publications speak for themselves and all characterizations thereof are denied.

46. The allegations in Paragraph 46 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 46. To the extent that the allegations in Paragraph 46 appear to be based on publications or interviews, those publications and interviews speak for themselves and all characterizations thereof are denied.

47. The allegations in Paragraph 47 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 47. To the extent that the allegations in Paragraph 47 appear to be based on publications, those publications speak for themselves and all characterizations thereof are denied.

48. Mr. Wenig denies the allegations in Paragraph 48, to the extent they relate to him. To the extent that the allegations in Paragraph 48 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 48. Further, to the extent that the allegations in Paragraph 48

appear to be based on publications, those publications speak for themselves and all characterizations thereof are denied.

49. To the extent that the allegations in Paragraph 49 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 49. To the extent that the allegations in Paragraph 49 appear to be based on publications, those publications speak for themselves and all characterizations thereof are denied. Mr. Wenig denies the remaining allegations in Paragraph 49, to the extent they relate to Mr. Wenig.

50. Mr. Wenig denies the allegations in Paragraph 50 to the extent they relate to him, except admits that Elliott Management bought shares of eBay in or about 2019 and sought changes within the company. To the extent that the allegations in Paragraph 50 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 50. To the extent that the allegations in Paragraph 50 appear to be based on publications, those publications speak for themselves and all characterizations thereof are denied.

51. To the extent that the allegations in Paragraph 51 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 51. To the extent the remaining allegations in Paragraph 51 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 51.

52. Mr. Wenig denies the allegations in Paragraph 52, except admits that on occasion he expressed frustration about what he believed to be inaccurate information that was being conveyed to eBay's small-business sellers. To the extent that the allegations in Paragraph 52 relate

to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 52.

53. Mr. Wenig denies the allegations in Paragraph 53 to the extent they relate to him. To the extent that the allegations in Paragraph 53 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 53.

54. The allegations in Paragraph 54 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 54.

55. The allegations in Paragraph 55 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 55. Further, to the extent that the allegations in Paragraph 55 appear to be based on articles or social media comments, those articles and social media comments speak for themselves and all characterizations thereof are denied.

56. Mr. Wenig admits that Fidomaster made threatening posts. The remaining allegations in Paragraph 56 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 56.

57. The allegations in Paragraph 57 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without

knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 57.

58. The allegations in Paragraph 58 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 58. To the extent the allegations in Paragraph 58 relate to documents, those documents speak for themselves.

59. The allegations in Paragraph 59 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 59. To the extent the allegations in Paragraph 59 relate to documents, those documents speak for themselves.

60. The allegations in Paragraph 60 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 60.

61. Mr. Wenig admits that he exchanged texts with Defendant Wymer on April 10, 2019. To the extent that the allegations in Paragraph 61 are based on text messages and publications, those messages and publications speak for themselves and all characterizations thereof are denied.

62. Mr. Wenig admits that he sent a text to Defendant Wymer on April 20, 2019. To the extent that the allegations in Paragraph 62 are based on text messages and news articles, those messages and articles speak for themselves and all characterizations thereof are denied.

63. The allegations in Paragraph 63 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 63. Further, to the extent that the allegations in Paragraph 63 appear to be based on articles or social media posts, those articles and social media posts speak for themselves and all characterizations thereof are denied.

64. The allegations in Paragraph 64 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 64. To the extent the allegations in Paragraph 64 appear to be based on documents, those documents speak for themselves and all characterizations thereof are denied.

65. The allegations in Paragraph 65 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 65.

66. Mr. Wenig admits that he exchanged texts with Defendant Wymer on May 31, 2019. To the extent that the allegations in Paragraph 66 appear to be based on articles, social media posts, or written communications, those articles, social media posts, and communications speak for themselves and all characterizations thereof are denied.

67. The allegations in Paragraph 67 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 67.

68. The allegations in Paragraph 68 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 68.

69. Mr. Wenig denies the allegations in Paragraph 69, to the extent they relate to him. The remaining allegations in Paragraph 69 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 69.

70. The allegations in Paragraph 70 appear to be based on a report that speaks for itself, and all characterizations thereof are denied.

71. To the extent that the allegations in Paragraph 71 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 71. To the extent the allegations in Paragraph 71 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 71.

72. The allegations in Paragraph 72 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 72.

73. To the extent the allegations in Paragraph 73 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 73. To the extent that the allegations in Paragraph 73 assert legal arguments and

conclusions of law, no response is required. To the extent the allegations in Paragraph 73 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 73.

74. The allegations in Paragraph 74 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 74. To the extent that the allegations in Paragraph 74 assert legal arguments and conclusions of law, no response is required. Further, to the extent the allegations in Paragraph 74 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required.

75. The allegations in Paragraph 75 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 75.

76. Mr. Wenig denies the allegations in Paragraph 76, to the extent they relate to him. To the extent the allegations in Paragraph 76 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 76.

77. The allegations in Paragraph 77 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 77.

78. The allegations in Paragraph 78 appear to be based on emails that speak for themselves. All characterizations thereof are denied.

79. The allegations in Paragraph 79 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without

knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 79.

80. Mr. Wenig denies the allegations in Paragraph 80.

81. The allegations in Paragraph 81 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 81.

82. Mr. Wenig denies the allegations in Paragraph 82 to the extent they relate to him, except he admits he exchanged texts with Defendant Wymer on August 1, 2019. To the extent the allegations in Paragraph 82 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 82. To the extent that the allegations in Paragraph 82 are based on online publications, articles, written communications, and text messages, those online publications, articles, written communications, and text messages speak for themselves and all characterizations thereof are denied.

83. Mr. Wenig admits that he went on sabbatical in Italy but denies the remaining allegations in Paragraph 83 to the extent they relate to him. To the extent the allegations in Paragraph 83 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 83.

84. Mr. Wenig denies the allegations in Paragraph 84, to the extent they relate to him. To the extent the allegations in Paragraph 84 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge

or information sufficient to form a belief as to the truth of the allegations in Paragraph 84. Further, to the extent Paragraph 84 asserts legal arguments and conclusions of law, no response is required.

85. Mr. Wenig denies the allegations in Paragraph 85, to the extent they relate to him. To the extent the allegations in Paragraph 85 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 85. Further, to the extent Paragraph 85 asserts legal arguments and conclusions of law, no response is required.

86. To the extent the allegations in Paragraph 86 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 86. Further, to the extent the allegations in Paragraph 86 relate to a document or communication, that document speaks for itself and all characterizations thereof are denied. To the extent the allegations in Paragraph 86 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 86.

87. The allegations in Paragraph 87 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 87.

88. The allegations in Paragraph 88 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 88.

89. The allegations in Paragraph 89 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 89.

90. To the extent the allegations in Paragraph 90 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 90. To the extent the allegations in Paragraph 90 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 90.

91. The allegations in Paragraph 91 appear to relate to documents and emails that speak for themselves. All characterizations of those documents are denied. To the extent the allegations in Paragraph 91 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 91.

92. The allegations in Paragraph 92 are based on written communications, and those communications speak for themselves and all characterizations thereof are denied.

93. The allegations in Paragraph 93 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 93. Further, to the extent that the allegations in Paragraph 93 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required. To the extent the allegations in Paragraph 93 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 93.

94. To the extent the allegations in Paragraph 94 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 94. To the extent the allegations in Paragraph 94 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 94.

95. To the extent the allegations in Paragraph 95 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 95. To the extent the allegations in Paragraph 95 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 95.

96. Mr. Wenig denies the allegations in Paragraph 96, to the extent they relate to him. To the extent the allegations in Paragraph 96 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 96. Further, to the extent that Paragraph 96 asserts legal arguments and conclusions of law, no response is required. Finally, to the extent that the allegations in Paragraph 96 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required.

97. To the extent the allegations in Paragraph 97 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 97. To the extent that Paragraph 97 asserts legal arguments and conclusions of law, no response is required. Further, to the extent that the allegations in Paragraph 97 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required. Finally, to the extent

the allegations in Paragraph 97 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 97.

98. To the extent the allegations in Paragraph 98 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 98. Further, to the extent the allegations in Paragraph 98 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 98.

99. To the extent the allegations in Paragraph 99 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 99. Further, to the extent the allegations in Paragraph 99 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 99.

100. Mr. Wenig denies the allegations in Paragraph 100, to the extent they relate to him. To the extent the allegations in Paragraph 100 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 100. To the extent that Paragraph 100 asserts legal arguments and conclusions of law, no response is required. Further, to the extent that the allegations in Paragraph 100 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required.

101. The allegations in Paragraph 101 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in

Paragraph 101. To the extent that Paragraph 101 asserts legal arguments and conclusions of law, no response is required.

102. To the extent the allegations in Paragraph 102 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 102. Further, to the extent the allegations in Paragraph 102 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 102.

103. The allegations in Paragraph 103 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 103. Further, to the extent that Paragraph 103 asserts legal arguments and conclusions of law, no response is required.

104. To the extent the allegations in Paragraph 104 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 104. To the extent that Paragraph 104 asserts legal arguments and conclusions of law, no response is required. Further, to the extent the allegations in Paragraph 104 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 104.

105. To the extent the allegations in Paragraph 105 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 105. To the extent that the allegations in Paragraph 105 relate to emails, those emails speak for themselves and all characterizations thereof are denied. To the extent the remaining

allegations in Paragraph 105 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 105.

106. The allegations in Paragraph 106 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 106.

107. The allegations in Paragraph 107 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 107.

108. To the extent the allegations in Paragraph 108 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 108. To the extent the allegations in Paragraph 108 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 108.

109. The allegations in Paragraph 109 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 109. The allegations in Paragraph 109 also appear to relate to emails, and those emails speak for themselves and all characterizations thereof are denied.

110. The allegations in Paragraph 110 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 110. The allegations in Paragraph 110 also appear to relate to emails, and those emails speak for themselves and all characterizations thereof are denied.

111. To the extent the allegations in Paragraph 111 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 111. Further, to the extent that Paragraph 111 asserts legal arguments and conclusions of law, no response is required. To the extent the allegations in Paragraph 111 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 111.

112. The allegations in Paragraph 112 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 112. To the extent the allegations in Paragraph 112 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 112.

113. The allegations in Paragraph 113 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 113.

114. The allegations in Paragraph 114 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 114.

115. To the extent the allegations in Paragraph 115 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 115. To the extent the allegations in Paragraph 115 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 115.

116. The allegations in Paragraph 116 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 116.

117. The allegations in Paragraph 117 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 117.

118. The allegations in Paragraph 118 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 118.

119. The allegations in Paragraph 119 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 119.

120. The allegations in Paragraph 120 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 120.

121. To the extent the allegations in Paragraph 121 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 121. To the extent that the allegations in Paragraph 121 assert legal arguments and conclusions of law, no response is required. To the extent the allegations in Paragraph 121 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 121.

122. The allegations in Paragraph 122 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 122.

123. To the extent the allegations in Paragraph 123 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 123. To the extent the allegations in Paragraph 123 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 123.

124. The allegations in Paragraph 124 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 124.

125. The allegations in Paragraph 125 and its subparts relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 125. To the extent the allegations in Paragraph 125 and its subparts relate to social media posts, those posts speak for themselves and all characterizations thereof are denied.

126. The allegations in Paragraph 126 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 126. Further, to the extent Paragraph 126 asserts legal arguments and conclusions of law, no response is required.

127. The allegations in Paragraph 127 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 127.

128. To the extent the allegations in Paragraph 128 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 128. To the extent the allegations in Paragraph 128 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 128.

129. The allegations in Paragraph 129 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 129.

130. To the extent the allegations in Paragraph 130 relate other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 130. To the extent that Paragraph 130 asserts legal arguments and conclusions of law, no response is required. To the extent the allegations in Paragraph 130 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 130.

131. The allegations in Paragraph 131 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 131.

132. To the extent the allegations in Paragraph 132 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in

Paragraph 132. To the extent the allegations in Paragraph 132 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 132.

133. The allegations in Paragraph 133 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 133. To the extent that Paragraph 133 asserts legal arguments and conclusions of law, no response is required.

134. The allegations in Paragraph 134 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 134.

135. Mr. Wenig denies the allegations in Paragraph 135, to the extent they relate to him. To the extent the allegations in Paragraph 135 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 135. To the extent that Paragraph 135 asserts legal arguments and conclusions of law, no response is required.

136. Mr. Wenig denies the allegations in Paragraph 136, to the extent they relate to him. To the extent the allegations in Paragraph 136 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 136. To the extent that Paragraph 136 asserts legal arguments and conclusions of law, no response is required. Further, to the extent that the allegations in Paragraph 136 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required.

137. The allegations in Paragraph 137 relate to other parties or third-party individuals and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 137. To the extent that Paragraph 137 asserts legal arguments and conclusions of law, no response is required. Further, to the extent that the allegations in Paragraph 137 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required.

138. The allegations in Paragraph 138 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 138.

139. The allegations in Paragraph 139 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 139.

140. The allegations in Paragraph 140 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 140.

141. The allegations in Paragraph 141 relate to other parties or third-party individuals and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 141. To the extent that Paragraph 141 asserts legal arguments and conclusions of law, no response is required. Further, to the extent that the allegations in Paragraph 141 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required.

142. Mr. Wenig denies the allegations in Paragraph 142, to the extent they relate to him. To the extent the allegations in Paragraph 142 relate to other parties or third-party individuals, or

are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 142. To the extent that Paragraph 142 asserts legal arguments and conclusions of law, no response is required.

143. The allegations in Paragraph 143 relate to other parties or third-party individuals and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 143. Further, to the extent that Paragraph 143 asserts legal arguments and conclusions of law, no response is required.

144. To the extent the allegations in Paragraph 144 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 144. Further, to the extent that Paragraph 144 asserts legal arguments and conclusions of law, no response is required. Finally, to the extent the allegations in Paragraph 144 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 144.

145. Mr. Wenig denies the allegations in Paragraph 145, to the extent they relate to him. To the extent the allegations in Paragraph 145 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 145. To the extent Paragraph 145 asserts legal arguments and conclusions of law, no response is required.

146. Mr. Wenig denies the allegations in Paragraph 146, to the extent they relate to him. To the extent the allegations in Paragraph 146 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 146. To the extent Paragraph 146 asserts legal arguments and conclusions of law, no response is required.

147. The allegations in Paragraph 147 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 147. To the extent that Paragraph 147 asserts legal arguments and conclusions of law, no response is required. Further, to the extent that the allegations in Paragraph 147 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required.

148. The allegations in Paragraph 148 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 148. To the extent that Paragraph 148 asserts legal arguments and conclusions of law, no response is required. Further, to the extent that the allegations in Paragraph 148 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required.

149. The allegations in Paragraph 149 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 149. To the extent the allegations in Paragraph 149 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 149.

150. The allegations in Paragraph 150 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 150. To the extent that Paragraph 150 asserts legal arguments and conclusions of law, no response is required. Further, to the extent that the allegations in Paragraph 150 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required.

151. The allegations in Paragraph 151 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 151. To the extent that Paragraph 151 asserts legal arguments and conclusions of law, no response is required.

152. The allegations in Paragraph 152 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 152. To the extent that Paragraph 152 asserts legal arguments and conclusions of law, no response is required. Further, to the extent that the allegations in Paragraph 152 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required.

153. The allegations in Paragraph 153 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 153. To the extent that Paragraph 153 asserts legal arguments and conclusions of law, no response is required. Finally, to the extent the allegations in Paragraph 153 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 153.

154. The allegations in Paragraph 154 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 154.

155. To the extent the allegations in Paragraph 155 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 155. To the extent that Paragraph 155 asserts legal arguments and conclusions of law, no response is required. Further, to the extent that the allegations in Paragraph 155 pertain to claims

dismissed in the Court's December 12, 2023 Order, no response is required. Finally, to the extent the allegations in Paragraph 155 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 155.

156. Mr. Wenig denies the allegations in Paragraph 156, to the extent they relate to him. To the extent the allegations in Paragraph 156 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 156. To the extent that Paragraph 156 asserts legal arguments and conclusions of law, no response is required. Further, to the extent that the allegations in Paragraph 156 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required.

157. To the extent the allegations in Paragraph 157 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 157. To the extent that Paragraph 157 asserts legal arguments and conclusions of law, no response is required. Further, to the extent that the allegations in Paragraph 157 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required. Finally, to the extent the allegations in Paragraph 157 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 157.

158. The allegations in Paragraph 158 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 158. To the extent that Paragraph 158 asserts legal arguments and conclusions of law, no response is required.

159. To the extent the allegations in Paragraph 159 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 159. To the extent that Paragraph 159 asserts legal arguments and conclusions of law, no response is required. Further, to the extent that the allegations in Paragraph 159 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required. Finally, to the extent the allegations in Paragraph 159 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 159.

160. Mr. Wenig denies the allegations in Paragraph 160, to the extent they relate to him. To the extent the allegations in Paragraph 160 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 160. To the extent that Paragraph 160 asserts legal arguments and conclusions of law, no response is required. Further, to the extent that the allegations in Paragraph 160 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required.

161. To the extent the allegations in Paragraph 161 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 161. To the extent that Paragraph 161 asserts legal arguments and conclusions of law, no response is required. Further, to the extent that the allegations in Paragraph 161 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required. Finally, to the extent the allegations in Paragraph 161 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 161.

162. Mr. Wenig denies the allegations in Paragraph 162, to the extent they relate to him. To the extent the allegations in Paragraph 162 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 162. To the extent that Paragraph 162 asserts legal arguments and conclusions of law, no response is required. Further, to the extent that the allegations in Paragraph 162 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required.

163. The allegations in Paragraph 163 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 163.

164. The allegations in Paragraph 164 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 164.

165. The allegations in Paragraph 165 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 165.

166. The allegations in Paragraph 166 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 166.

167. To the extent the allegations in Paragraph 167 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in

Paragraph 167. Finally, to the extent the allegations in Paragraph 167 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 167.

168. Mr. Wenig denies the allegations in Paragraph 168, to the extent they relate to him. To the extent the allegations in Paragraph 168 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 168. To the extent that Paragraph 168 asserts legal arguments and conclusions of law, no response is required. Further, to the extent that the allegations in Paragraph 168 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required.

169. The allegations in Paragraph 169 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 169.

170. Mr. Wenig denies the allegations in Paragraph 170, to the extent they relate to him. To the extent the allegations in Paragraph 170 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 170. To the extent that Paragraph 170 asserts legal arguments and conclusions of law, no response is required. Further, to the extent that the allegations in Paragraph 170 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required.

171. The allegations in Paragraph 171 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 171.

172. To the extent the allegations in Paragraph 172 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 172. To the extent the allegations in Paragraph 172 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 172.

173. The allegations in Paragraph 173 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 173.

174. The allegations in Paragraph 174 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 174.

175. The allegations in Paragraph 175 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 175.

176. The allegations in Paragraph 176 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 176.

177. Mr. Wenig denies the allegations in Paragraph 177, to the extent they relate to him. To the extent the allegations in Paragraph 177 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 177. To the extent that Paragraph 177 asserts legal arguments and conclusions of law, no response is required.

Further, to the extent that the allegations in Paragraph 177 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required.

178. Mr. Wenig denies the allegations in Paragraph 178, to the extent they relate to him. To the extent the allegations in Paragraph 178 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 178. To the extent that Paragraph 178 asserts legal arguments and conclusions of law, no response is required. Further, to the extent that the allegations in Paragraph 178 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required.

179. The allegations in Paragraph 179 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 179.

180. To the extent the allegations in Paragraph 180 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 180. Further, to the extent the allegations in Paragraph 180 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 180.

181. The allegations in Paragraph 181 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 181. Further, to the extent Paragraph 181 asserts legal arguments and conclusions of law, no response is required.

182. Mr. Wenig denies the allegations in Paragraph 182, to the extent they relate to him. To the extent the allegations in Paragraph 182 relate to other parties or third-party individuals, or

are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 182. To the extent that Paragraph 182 asserts legal arguments and conclusions of law, no response is required.

183. The allegations in Paragraph 183 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 183.

184. Mr. Wenig denies the allegations in Paragraph 184, to the extent they relate to him. To the extent the allegations in Paragraph 184 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 184. To the extent that Paragraph 184 asserts legal arguments and conclusions of law, no response is required.

185. The allegations in Paragraph 185 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 185. Further, to the extent that Paragraph 185 asserts legal arguments and conclusions of law, no response is required.

186. The allegations in Paragraph 186 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 186.

187. Mr. Wenig denies the allegations in Paragraph 187, to the extent they relate to him. To the extent the allegations in Paragraph 187 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 187.

188. To the extent the allegations in Paragraph 188 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 188. To the extent that Paragraph 188 asserts legal arguments and conclusions of law, no response is required. Further, to the extent that the allegations in Paragraph 188 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required.

189. Mr. Wenig denies the allegations in Paragraph 189, to the extent they relate to him. To the extent the allegations in Paragraph 189 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 189. To the extent that Paragraph 189 asserts legal arguments and conclusions of law, no response is required. Further, to the extent that the allegations in Paragraph 189 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required.

190. The allegations in Paragraph 190 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 190. To the extent that Paragraph 190 asserts legal arguments and conclusions of law, no response is required. Further, to the extent that the allegations in Paragraph 190 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required. Finally, to the extent the allegations in Paragraph 190 are based on written communications, those communications speak for themselves and all characterizations thereof are denied.

191. Mr. Wenig denies the allegations in Paragraph 191, to the extent they relate to him. To the extent the allegations in Paragraph 191 relate to other parties or third-party individuals, or

are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 191. To the extent that Paragraph 191 asserts legal arguments and conclusions of law, no response is required. Further, to the extent that the allegations in Paragraph 191 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required.

192. Mr. Wenig denies the allegations in Paragraph 192, to the extent they relate to him. To the extent the allegations in Paragraph 192 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 192.

193. To the extent the allegations in Paragraph 193 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 193. To the extent the allegations in Paragraph 193 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 193.

194. The allegations in Paragraph 194 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 194.

195. The allegations in Paragraph 195 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 195.

196. The allegations in Paragraph 196 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to

the truth of the allegations in Paragraph 196. Further, to the extent that Paragraph 196 asserts legal arguments and conclusions of law, no response is required.

197. The allegations in Paragraph 197 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 197.

198. The allegations in Paragraph 198 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 198.

199. The allegations in Paragraph 199 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 199. To the extent the allegations in Paragraph 199 assert legal arguments and conclusions of law, no response is required. Finally, to the extent the allegations in Paragraph 199 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 199.

200. The allegations in Paragraph 200 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 200. To the extent that Paragraph 200 asserts legal arguments and conclusions of law, no response is required. Further, to the extent that the allegations in Paragraph 200 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required.

201. The allegations in Paragraph 201 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without

knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 201.

202. The allegations in Paragraph 202 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 202. To the extent Paragraph 202 asserts legal arguments and conclusions of law, no response is required.

203. Mr. Wenig denies the allegations in Paragraph 203, to the extent they relate to him. To the extent the allegations in Paragraph 203 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 203. To the extent Paragraph 203 asserts legal arguments and conclusions of law, no response is required.

204. Mr. Wenig denies the allegations in Paragraph 204, to the extent they relate to him. To the extent the allegations in Paragraph 204 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 204. To the extent Paragraph 204 asserts legal arguments and conclusions of law, no response is required.

205. Mr. Wenig denies the allegations in Paragraph 205, to the extent they relate to him. To the extent the allegations in Paragraph 205 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 205. To the extent Paragraph 205 asserts legal arguments and conclusions of law, no response is required.

206. The allegations in Paragraph 206 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to

the truth of the allegations in Paragraph 206. Further, Paragraph 206 asserts legal arguments and conclusions of law, and no response is required.

207. The allegations in Paragraph 207 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 207.

208. Mr. Wenig denies the allegations in Paragraph 208, to the extent they relate to him. To the extent the allegations in Paragraph 208 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 208. To the extent Paragraph 208 asserts legal arguments and conclusions of law, no response is required. Further, to the extent the allegations in Paragraph 208 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required.

209. The allegations in Paragraph 209 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 209.

210. Mr. Wenig denies the allegations in Paragraph 210, to the extent they relate to him. To the extent the allegations in Paragraph 210 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 210. To the extent Paragraph 210 asserts legal arguments and conclusions of law, no response is required. Further, to the extent the allegations in Paragraph 210 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required.

211. Mr. Wenig denies the allegations in Paragraph 211, to the extent they relate to him. To the extent the allegations in Paragraph 211 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 211. To the extent Paragraph 211 asserts legal arguments and conclusions of law, no response is required.

212. To the extent the allegations in Paragraph 212 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 212. To the extent Paragraph 212 asserts legal arguments and conclusions of law, no response is required. Further, to the extent the allegations in Paragraph 212 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required. Finally, to the extent the allegations in Paragraph 212 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 212.

213. To the extent the allegations in Paragraph 213 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 213. To the extent the allegations in Paragraph 213 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 213.

214. Mr. Wenig denies the allegations in Paragraph 214, to the extent they relate to him. To the extent the allegations in Paragraph 214 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 214. To the extent Paragraph 214 asserts legal arguments and conclusions of law, no response is required.

215. Mr. Wenig denies the allegations in Paragraph 215, to the extent they relate to him. To the extent the allegations in Paragraph 215 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 215. To the extent Paragraph 215 asserts legal arguments and conclusions of law, no response is required.

216. Mr. Wenig denies the allegations in Paragraph 216, to the extent they relate to him. To the extent the allegations in Paragraph 216 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 216. To the extent Paragraph 216 asserts legal arguments and conclusions of law, no response is required. Further, to the extent the allegations in Paragraph 216 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required.

217. Mr. Wenig denies the allegations in Paragraph 217, to the extent they relate to him. To the extent the allegations in Paragraph 217 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 217. To the extent Paragraph 217 asserts legal arguments and conclusions of law, no response is required. Further, to the extent the allegations in Paragraph 217 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required.

218. The allegations in Paragraph 218 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 218.

219. The allegations in Paragraph 219 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 219.

220. The allegations in Paragraph 220 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 220.

221. The allegations in Paragraph 221 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 221.

222. The allegations in Paragraph 222 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 222. Further, to the extent the allegations in Paragraph 222 are based on documents, those documents speak for themselves and all characterizations thereof are denied.

223. The allegations in Paragraph 223 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 223. To the extent Paragraph 223 asserts legal arguments and conclusions of law, no response is required. Further, to the extent the allegations in Paragraph 223 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required.

224. Mr. Wenig denies the allegations in Paragraph 224, to the extent they relate to him. To the extent the allegations in Paragraph 224 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge

or information sufficient to form a belief as to the truth of the allegations in Paragraph 224. Further, to the extent the allegations in Paragraph 224 are based on documents, those documents speak for themselves and all characterizations thereof are denied.

225. Mr. Wenig denies the allegations in Paragraph 225, to the extent they relate to him. To the extent the allegations in Paragraph 225 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 225. To the extent Paragraph 225 asserts legal arguments and conclusions of law, no response is required.

226. Mr. Wenig denies the allegations in Paragraph 226, to the extent they relate to him. To the extent the allegations in Paragraph 226 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 226. To the extent Paragraph 226 asserts legal arguments and conclusions of law, no response is required. Further, to the extent the allegations in Paragraph 226 are based on texts and written communications, those communications speak for themselves and all characterizations thereof are denied.

227. Mr. Wenig denies the allegations in Paragraph 227, to the extent they relate to him. To the extent the allegations in Paragraph 227 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 227. To the extent Paragraph 227 asserts legal arguments and conclusions of law, no response is required. Further, to the extent the allegations in Paragraph 227 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required.

228. Mr. Wenig denies the allegations in Paragraph 228, to the extent they relate to him. To the extent the allegations in Paragraph 228 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 228. To the extent Paragraph 228 asserts legal arguments and conclusions of law, no response is required. Further, to the extent the allegations in Paragraph 228 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required.

229. Mr. Wenig denies the allegations in Paragraph 229 to the extent they relate to him. To the extent the allegations in Paragraph 229 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 229. To the extent Paragraph 229 asserts legal arguments and conclusions of law, no response is required. Further, to the extent the allegations in Paragraph 229 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required.

230. Mr. Wenig denies the allegations in Paragraph 230, to the extent they relate to him. To the extent the allegations in Paragraph 230 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 230. To the extent Paragraph 230 asserts legal arguments and conclusions of law, no response is required. Further, to the extent the allegations in Paragraph 230 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required.

231. Mr. Wenig denies the allegations in Paragraph 231, to the extent they relate to him. To the extent the allegations in Paragraph 231 relate to other parties or third-party individuals, or

are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 231. To the extent Paragraph 231 asserts legal arguments and conclusions of law, no response is required. Further, to the extent the allegations in Paragraph 231 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required.

232. Mr. Wenig denies the allegations in Paragraph 232, to the extent they relate to him. To the extent the allegations in Paragraph 232 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 232. To the extent Paragraph 232 asserts legal arguments and conclusions of law, no response is required. Further, to the extent the allegations in Paragraph 232 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required.

233. The allegations in Paragraph 233 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 233. To the extent Paragraph 233 asserts legal arguments and conclusions of law, no response is required. Further, to the extent the allegations in Paragraph 233 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required.

234. The allegations in Paragraph 234 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 234.

235. To the extent the allegations in Paragraph 235 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is

without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 235. To the extent Paragraph 235 asserts legal arguments and conclusions of law, no response is required. Further, to the extent the allegations in Paragraph 235 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required. Finally, to the extent the allegations in Paragraph 235 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 235.

236. To the extent the allegations in Paragraph 236 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 236. To the extent Paragraph 236 asserts legal arguments and conclusions of law, no response is required. Further, to the extent the allegations in Paragraph 236 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required. Finally, to the extent the allegations in Paragraph 236 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 236.

237. The allegations in Paragraph 237 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 237. To the extent Paragraph 237 asserts legal arguments and conclusions of law, no response is required.

238. The allegations in Paragraph 238 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 238. Further, to the extent Paragraph 238 asserts legal arguments and conclusions of law, no response is required. Finally, to the extent the allegations in Paragraph 238 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 238.

239. The allegations in Paragraph 239 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 239. Further, to the extent Paragraph 239 asserts legal arguments and conclusions of law, no response is required.

240. To the extent the allegations in Paragraph 240 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 240. Further, to the extent the allegations in Paragraph 240 are based on written communications, those communications speak for themselves and all characterizations thereof are denied. To the extent Paragraph 240 asserts legal arguments and conclusions of law, no response is required. Finally, to the extent the allegations in Paragraph 240 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 240.

241. To the extent the allegations in Paragraph 241 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 241. To the extent Paragraph 241 asserts legal arguments and conclusions of law, no response is required. Finally, to the extent the allegations in Paragraph 241 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 241.

242. To the extent the allegations in Paragraph 242 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 242. Further, to the extent the allegations in Paragraph 242 are based on written communications, those communications speak for themselves and all characterizations thereof are

denied. Finally, to the extent the allegations in Paragraph 242 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 242.

243. The allegations in Paragraph 243 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 243. Further, to the extent the allegations in Paragraph 243 are based on written communications, those communications speak for themselves and all characterizations thereof are denied.

244. Mr. Wenig denies the allegations in Paragraph 244, to the extent they relate to him. To the extent the allegations in Paragraph 244 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 244. To the extent Paragraph 244 asserts legal arguments and conclusions of law, no response is required.

245. The allegations in Paragraph 245 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 245.

246. The allegations in Paragraph 246 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 246. Further, to the extent Paragraph 246 asserts legal arguments and conclusions of law, no response is required.

247. The allegations in Paragraph 247 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 247. Further, to the extent Paragraph 247 asserts legal arguments and conclusions of law, no response is required.

248. The allegations in Paragraph 248 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 248.

249. The allegations in Paragraph 249 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 249.

250. The allegations in Paragraph 250 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 250. To the extent the allegations in Paragraph 250 are based on webpages and marketing materials, those materials speak for themselves and all characterizations thereof are denied.

251. The allegations in Paragraph 251 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 251. Further, to the extent Paragraph 251 asserts legal arguments and conclusions of law, no response is required.

252. The allegations in Paragraph 252 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 252. Further, to the extent Paragraph 252 asserts legal arguments and conclusions of law, no response is required.

253. The allegations in Paragraph 253 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 253.

254. The allegations in Paragraph 254 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 254. Further, to the extent the allegations in Paragraph 254 are based on written communications, those communications speak for themselves and all characterizations thereof are denied.

255. The allegations in Paragraph 255 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 255.

256. The allegations in Paragraph 256 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 256.

257. The allegations in Paragraph 257 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 257.

258. The allegations in Paragraph 258 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 258.

259. To the extent the allegations in Paragraph 259 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 259. To the extent the allegations in Paragraph 259 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 259.

260. The allegations in Paragraph 260 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 260.

261. The allegations in Paragraph 261 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 261.

262. To the extent the allegations in Paragraph 262 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 262. To the extent Paragraph 262 asserts legal arguments and conclusions of law, no response is required. Finally, to the extent the allegations in Paragraph 262 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 262.

263. The allegations in Paragraph 263 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 263.

264. Mr. Wenig denies the allegations in Paragraph 264, to the extent they relate to him. To the extent the allegations in Paragraph 264 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 264. To the extent Paragraph 264 asserts legal arguments and conclusions of law, no response is required.

265. The allegations in Paragraph 265 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 265.

266. The allegations in Paragraph 266 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 266. Further, to the extent Paragraph 266 asserts legal arguments and conclusions of law, no response is required. To the extent the allegations in Paragraph 266 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required. Finally, to the extent that the allegations in Paragraph 266 are quoting a document or communication, that document speaks for itself and all characterizations thereof are denied.

267. Mr. Wenig admits he tweeted on August 29, 2019, but the tweet speaks for itself and all inferences and characterizations thereof are denied.

268. Mr. Wenig denies the allegations in Paragraph 268, to the extent they relate to him. To the extent the allegations in Paragraph 268 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 268. Further, to the extent Paragraph 268 asserts legal arguments and conclusions of law, no response is required.

269. The allegations in Paragraph 269 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 269.

270. Mr. Wenig denies the allegations in Paragraph 270.

271. The allegations in Paragraph 271 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in

Paragraph 271. Further, to the extent Paragraph 271 asserts legal arguments and conclusions of law, no response is required.

272. The allegations in Paragraph 272 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 272. Further, to the extent the allegations in Paragraph 272 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 272.

273. The allegations in Paragraph 273 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 273. Further, to the extent Paragraph 273 asserts legal arguments and conclusions of law, no response is required.

274. The allegations in Paragraph 274 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 274.

275. To the extent the allegations in Paragraph 275 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 275. Finally, to the extent the allegations in Paragraph 275 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 275.

276. The allegations in Paragraph 276 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 276.

277. To the extent the allegations in Paragraph 277 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 277. To the extent the allegations in Paragraph 277 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 277.

278. The allegations in Paragraph 278 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 278.

279. The allegations in Paragraph 279 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 279. To the extent Paragraph 279 asserts legal arguments and conclusions of law, no response is required.

280. To the extent the allegations in Paragraph 280 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 280. To the extent the allegations in Paragraph 280 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 280.

281. To the extent the allegations in Paragraph 281 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 281. To the extent the allegations in Paragraph 281 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 281.

282. The allegations in Paragraph 282 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 282.

283. The allegations in Paragraph 283 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 283. To the extent Paragraph 283 asserts legal arguments and conclusions of law, no response is required. Further, to the extent the allegations in Paragraph 283 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required.

284. The allegations in Paragraph 284 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 284.

285. To the extent the allegations in Paragraph 285 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 285. To the extent the allegations in Paragraph 285 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 285. Further, to the extent the allegations in Paragraph 285 are based on text messages, those texts speak for themselves and all characterizations thereof are denied.

286. The allegations in Paragraph 286 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 286. To the extent the allegations in Paragraph 286 are

based on press releases, those press releases speak for themselves and all characterizations thereof are denied.

287. Mr. Wenig admits that he departed from eBay in September 2019. To the extent the allegations in Paragraph 287 are based on a document, that document speaks for itself and all characterizations thereof are denied. To the extent the allegations in Paragraph 287 relate to parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 287. To the extent Paragraph 287 asserts legal arguments and conclusions of law, no response is required. Further, to the extent the allegations in Paragraph 287 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required. Finally, to the extent the allegations in Paragraph 287 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 287.

288. Mr. Wenig admits that he resigned from eBay but denies any characterizations or inferences concerning that resignation. To the extent the allegations in Paragraph 288 are based on a document, that document speaks for itself and all characterizations thereof are denied. To the extent the allegations in Paragraph 288 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 288. To the extent Paragraph 288 asserts legal arguments and conclusions of law, no response is required.

289. Mr. Wenig admits that eBay terminated Defendant Wymer. The remaining allegations in Paragraph 289 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 289.

290. The allegations in Paragraph 290 appear to be based on a written communication that speaks for itself, and all characterizations thereof are denied. To the extent the allegations in Paragraph 290 relate to parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 290. To the extent Paragraph 290 asserts legal arguments and conclusions of law, no response is required. Finally, to the extent the allegations in Paragraph 290 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 290.

291. Mr. Wenig denies the allegations in Paragraph 291, except he admits that Morgan Lewis, retained by eBay, conducted an investigation into the events involving Plaintiffs. Mr. Wenig is without knowledge or information concerning further details of that investigation and avers that to the extent the allegations in Paragraph 291 are based on documents, those documents speak for themselves and all characterizations thereof are denied. To the extent the allegations in Paragraph 291 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 291.

292. The allegations in Paragraph 292 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 292. To the extent the allegations in Paragraph 292 are based on documents, those documents speak for themselves and all characterizations thereof are denied.

293. The allegations in Paragraph 293 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in

Paragraph 293. To the extent the allegations in Paragraph 293 are based on documents, those documents speak for themselves and all characterizations thereof are denied.

294. The allegations in Paragraph 294 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 294. To the extent the allegations in Paragraph 294 are based on documents or a 10-K filing, the documents speak for themselves and all characterizations thereof are denied.

295. The allegations in Paragraph 295 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 295. To the extent the allegations in Paragraph 295 are based on documents, the documents speak for themselves and all characterizations thereof are denied.

296. Mr. Wenig admits that Morgan Lewis, retained by eBay, conducted an investigation into the events involving Plaintiffs. The allegations in Paragraph 296 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 296. To the extent the allegations in Paragraph 296 concern documents, the documents speak for themselves and all characterizations are denied. Finally, to the extent Paragraph 296 asserts legal arguments and conclusions of law, no response is required.

297. To the extent the allegations in Paragraph 297 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 297. To the extent Paragraph 297 asserts legal arguments and conclusions of law, no

response is required. To the extent the allegations in Paragraph 297 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 297.

298. The allegations in Paragraph 298 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 298.

299. The allegations in Paragraph 299 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 299.

300. The allegations in Paragraph 300 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 300.

301. The allegations in Paragraph 301 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 301.

302. Mr. Wenig admits eBay hired Defendant Baugh, but is without knowledge or information concerning the precise date.

303. Mr. Wenig denies the allegations in Paragraph 303, to the extent they relate to him.

304. The allegations in Paragraph 304 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 304. Further, to the extent that Paragraph 304 asserts legal arguments and conclusions of law, no response is required.

305. Mr. Wenig denies the allegations in Paragraph 305, to the extent they relate to him. To the extent the allegations in Paragraph 305 relate to other parties or third-party individuals, or

are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 305.

306. The allegations in Paragraph 306 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 306. Further, to the extent that Paragraph 306 asserts legal arguments and conclusions of law, no response is required.

307. Mr. Wenig denies the allegations in Paragraph 307, to the extent they relate to him. To the extent the allegations in Paragraph 307 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 307. Further, to the extent that Paragraph 307 asserts legal arguments and conclusions of law, no response is required.

308. Mr. Wenig denies the allegations in Paragraph 308. To the extent the allegations in Paragraph 308 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 308. Further, to the extent the allegations in Paragraph 308 are based on written communications, those communications speak for themselves and all characterizations thereof are denied.

309. Mr. Wenig denies the allegations in Paragraph 309. To the extent the allegations in Paragraph 309 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 309. Further, to the extent that Paragraph 309 asserts legal arguments and conclusions of law, no response is required.

310. Mr. Wenig admits that he, Defendant Baugh, Defendant Wymer, and Defendant Jones had physical workspaces that were near one another. Mr. Wenig denies the remaining allegations in Paragraph 310.

311. Mr. Wenig admits that Defendant Baugh had his cell phone number.

312. The allegations in Paragraph 312 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 312. To the extent Paragraph 312 asserts legal arguments and conclusions of law, no response is required. Further, to the extent the allegations in Paragraph 312 are based on documents, those documents speak for themselves and all characterizations thereof are denied.

313. The allegations in Paragraph 313 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 313. To the extent Paragraph 313 asserts legal arguments and conclusions of law, no response is required.

314. Mr. Wenig denies the allegations in Paragraph 314.

315. Mr. Wenig denies the allegations in Paragraph 315 to the extent they relate to him, except he avers that there were safety drills at eBay, but Mr. Wenig lacks knowledge or information concerning who specifically organized those drills. To the extent the allegations in Paragraph 315 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 315. To the extent Paragraph 315 asserts legal arguments and conclusions of law, no response is required.

316. The allegations in Paragraph 316 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 316.

317. The allegations in Paragraph 317 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 317.

318. The allegations in Paragraph 318 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 318.

319. To the extent the allegations in Paragraph 319 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 319. Further, to the extent the allegations in Paragraph 319 assert legal arguments and conclusions of law, no response is required. Finally, to the extent the allegations in Paragraph 319 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 319.

320. The allegations in Paragraph 320 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 320.

321. Mr. Wenig denies the allegations in Paragraph 321, to the extent they relate to him. To the extent the allegations in Paragraph 321 relate other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 321.

322. The allegations in Paragraph 322 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 322. To the extent the allegations in Paragraph 322 relate to Mr. Wenig, he denies the allegations. Further, to the extent that Paragraph 322 asserts legal arguments or conclusions of law, no response is required.

323. Mr. Wenig denies the allegations in Paragraph 323, to the extent they relate to him. To the extent the allegations in Paragraph 323 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 323.

324. Mr. Wenig denies the allegations in Paragraph 324, to the extent they relate to him. To the extent the allegations in Paragraph 324 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 324. Further, to the extent that Paragraph 324 asserts legal arguments and conclusions of law, no response is required.

325. Mr. Wenig denies the allegations in Paragraph 325, to the extent they relate to him. To the extent the allegations in Paragraph 325 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 325. Further, to the extent that Paragraph 325 asserts legal arguments and conclusions of law, no response is required.

326. The allegations in Paragraph 326 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 326.

327. Mr. Wenig admits that a café was built on eBay's campus at his request but denies that there was a "pervasive drinking culture throughout eBay." To the extent the allegations in Paragraph 327 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 327. Further, to the extent that Paragraph 327 asserts legal arguments and conclusions of law, no response is required. Finally, to the extent the remaining allegations in Paragraph 327 relate to Mr. Wenig, Mr. Wenig denies them.

328. The allegations in Paragraph 328 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 328.

329. The allegations in Paragraph 329 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 329.

330. The allegations in Paragraph 330 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 330. Further, to the extent that Paragraph 330 asserts legal arguments and conclusions of law, no response is required.

331. To the extent that the allegations in Paragraph 331 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in

Paragraph 331. Finally, to the extent the allegations in Paragraph 331 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 331.

332. Mr. Wenig denies the allegations in Paragraph 332, to the extent they relate to him. To the extent that the allegations in Paragraph 332 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 332. To the extent Paragraph 332 asserts legal arguments and conclusions of law, no response is required. Further, to the extent the allegations in Paragraph 332 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required.

333. The allegations in Paragraph 333 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 333. Further, to the extent that Paragraph 333 asserts legal arguments or conclusions of law, no response is required.

334. The allegations in Paragraph 334 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 334. Further, to the extent that Paragraph 334 asserts legal arguments and conclusions of law, no response is required.

335. The allegations in Paragraph 335 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 335.

336. The allegations in Paragraph 336 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 336.

337. Mr. Wenig denies the allegations in Paragraph 337, to the extent they relate to him. To the extent the allegations in Paragraph 337 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 337. Further, to the extent the allegations in Paragraph 337 assert legal arguments or conclusions of law, no response is required.

338. To the extent the allegations in Paragraph 338 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 338. Further, to the extent that Paragraph 338 asserts legal arguments and conclusions of law, no response is required. Finally, to the extent the allegations in Paragraph 338 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 338.

339. The allegations in Paragraph 339 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 339.

340. The allegations in Paragraph 340 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 340.

341. The allegations in Paragraph 341 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 341.

342. The allegations in Paragraph 342 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 342.

343. The allegations in Paragraph 343 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 343.

344. The allegations in Paragraph 344 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 344.

345. The allegations in Paragraph 345 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 345.

346. The allegations in Paragraph 346 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 346.

347. The allegations in Paragraph 347 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 347.

348. The allegations in Paragraph 348 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 348. To the extent that Paragraph 348 asserts legal arguments and conclusions of law, no response is required.

349. The allegations in Paragraph 349 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 349.

350. The allegations in Paragraph 350 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 350.

351. The allegations in Paragraph 351 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 351.

352. The allegations in Paragraph 352 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 352.

353. The allegations in Paragraph 353 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 353.

354. The allegations in Paragraph 354 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 354. Further, to the extent that Paragraph 354 asserts legal arguments and conclusions of law, no response is required.

355. The allegations in Paragraph 355 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 355.

356. The allegations in Paragraph 356 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 356.

357. The allegations in Paragraph 357 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 357. Further, to the extent that Paragraph 357 asserts legal arguments and conclusions of law, no response is required.

358. The allegations in Paragraph 358 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 358.

359. The allegations in Paragraph 359 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 359.

360. The allegations in Paragraph 360 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 360. Further, to the extent Paragraph 360 asserts legal arguments and conclusions of law, no response is required.

361. The allegations in Paragraph 361 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 361.

362. To the extent the allegations in Paragraph 362 are based on public news articles, criminal proceedings, or filings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 362. Further, to the extent

the allegations in Paragraph 362 are based on filings in criminal cases, such filings speak for themselves.

363. The allegations in Paragraph 363 and its subparts relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 363. Further, to the extent the allegations in Paragraph 363 are based on filings in criminal cases, such filings speak for themselves.

364. The allegations in Paragraph 364 and its subparts relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 364. Further, to the extent the allegations in Paragraph 364 are based on filings in criminal cases, such filings speak for themselves.

365. The allegations in Paragraph 365 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 365. Further, to the extent the allegations in Paragraph 365 are based on filings in criminal cases, such filings speak for themselves.

366. To the extent the allegations in Paragraph 366 and its subparts relate to other parties or third-party individuals, or are based on news articles, criminal proceedings, or criminal hearings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 366. Further, to the extent the allegations in Paragraph 366 are based on filings in criminal cases, such filings speak for themselves.

367. To the extent the allegations in Paragraph 367 relate to other parties or third-party individuals, or are based on news articles, criminal proceedings, or criminal hearings or filings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the

truth of the allegations in Paragraph 367. Further, to the extent the allegations in Paragraph 367 are based on filings in criminal cases, such filings speak for themselves.

368. To the extent the allegations in Paragraph 368 relate to other parties or third-party individuals, or are based on news articles, criminal proceedings, or criminal hearings or filings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 368. Further, to the extent the allegations in Paragraph 368 are based on filings in criminal cases, such filings speak for themselves.

369. To the extent the allegations in Paragraph 369 relate to other parties or third-party individuals, or are based on news articles, criminal proceedings, or criminal hearings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 369. Further, to the extent the allegations in Paragraph 369 are based on filings in criminal cases, such filings speak for themselves.

370. Mr. Wenig admits that Baugh, Harville, Cooke, and Popp were sentenced to prison, but he denies knowledge as to the specifics of their sentences. Further, the allegations in Paragraph 370 relate to other parties or third-party individuals, or are based on news articles, criminal proceedings, or criminal hearings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 370. Further, to the extent the allegations in Paragraph 370 are based on filings in criminal cases, such filings speak for themselves.

371. Mr. Wenig denies the allegations in Paragraph 371, to the extent they relate to him. To the extent the allegations in Paragraph 371 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 371. Further,

to the extent the allegations in Paragraph 371 are based on documents, those documents speak for themselves and all characterizations thereof are denied.

372. The allegations in Paragraph 372 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 372. Further, to the extent the allegations in Paragraph 372 are based on documents, those documents speak for themselves and all characterizations thereof are denied.

373. Mr. Wenig denies the allegations in Paragraph 373, to the extent they relate to him. To the extent the allegations in Paragraph 373 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 373. Further, to the extent the allegations in Paragraph 373 are based on documents, those documents speak for themselves and all characterizations thereof are denied.

374. The allegations in Paragraph 374 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 374.

375. The allegations in Paragraph 375 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 375.

376. The allegations in Paragraph 376 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 376.

377. The allegations in Paragraph 377 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 377.

378. The allegations in Paragraph 378 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 378.

379. To the extent the allegations in Paragraph 379 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 379. To the extent the allegations in Paragraph 379 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 379. Finally, to the extent that Paragraph 379 asserts legal arguments and conclusions of law, no response is required.

380. Mr. Wenig denies the allegations in Paragraph 380, to the extent they relate to him. To the extent the allegations in Paragraph 380 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 380. Further, to the extent Paragraph 380 asserts legal arguments or conclusions of law, no response is required.

381. The allegations in Paragraph 381 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 381. To the extent the allegations in Paragraph 381 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 381. Further, to the extent that Paragraph 381 asserts legal arguments and conclusions of law, no response is required. Finally, to the extent that the allegations

in Paragraph 381 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required.

382. Mr. Wenig denies the allegations in Paragraph 382, to the extent they relate to him. To the extent the allegations in Paragraph 382 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 382. Further, to the extent that Paragraph 382 asserts legal arguments and conclusions of law, no response is required.

383. Mr. Wenig denies the allegations in Paragraph 383, to the extent they relate to him. To the extent the allegations in Paragraph 383 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 383. Further, to the extent that Paragraph 383 asserts legal arguments and conclusions of law, no response is required.

384. The allegations in Paragraph 384 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 384.

385. The allegations in Paragraph 385 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 385.

386. Mr. Wenig denies the allegations in Paragraph 386, to the extent they relate to him. To the extent the allegations in Paragraph 386 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 386. Further, to the extent Paragraph 386 asserts legal arguments or conclusions of law, no response is required.

387. The allegations in Paragraph 387 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 387.

388. The allegations in Paragraph 388 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 388.

389. Mr. Wenig denies the allegations in Paragraph 389, to the extent they relate to him. To the extent the allegations in Paragraph 389 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 389. Further, to the extent that Paragraph 389 asserts legal arguments and conclusions of law, no response is required.

390. The allegations in Paragraph 390 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 390. Further, to the extent that Paragraph 390 asserts legal arguments and conclusions of law, no response is required.

391. Mr. Wenig denies the allegations in Paragraph 391, to the extent they relate to him. To the extent the allegations in Paragraph 391 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 391. Further, to the extent that Paragraph 391 asserts legal arguments and conclusions of law, no response is required.

392. The allegations in Paragraph 392 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 392.

393. The allegations in Paragraph 393 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 393.

394. The allegations in Paragraph 394 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 394.

395. The allegations in Paragraph 395 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 395.

396. The allegations in Paragraph 396 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 396.

397. The allegations in Paragraph 397 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 397.

398. The allegations in Paragraph 398 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 398.

399. The allegations in Paragraph 399 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 399.

400. Mr. Wenig denies the allegations in Paragraph 400, to the extent they relate to him. To the extent the allegations in Paragraph 400 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 400. To the extent the allegations in Paragraph 400 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 400. Further, to the extent that Paragraph 400 asserts legal arguments and conclusions of law, no response is required.

401. To the extent the allegations in Paragraph 401 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 401. To the extent the allegations in Paragraph 401 relate to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 401. Further, to the extent that Paragraph 401 asserts legal arguments and conclusions of law, no response is required.

402. Mr. Wenig denies the allegations in Paragraph 402, to the extent they relate to him. To the extent the allegations in Paragraph 402 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 402. To the extent that the allegations in Paragraph 402 pertain to claims dismissed in the Court's December 12, 2023 Order, no response is required. Further, to the extent that Paragraph 402 asserts legal arguments and conclusions of law, no response is required.

403. Mr. Wenig denies the allegations in Paragraph 403, to the extent they relate to him. To the extent the allegations in Paragraph 403 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 403. Further, to the extent that Paragraph 403 asserts legal arguments and conclusions of law, no response is required.

404. Mr. Wenig denies the allegations in Paragraph 404, to the extent they relate to him. To the extent the allegations in Paragraph 404 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 404. Further, to the extent that Paragraph 404 asserts legal arguments and conclusions of law, no response is required.

405. Mr. Wenig denies the allegations in Paragraph 405, to the extent they relate to him. To the extent the allegations in Paragraph 405 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 405. Further, to the extent that Paragraph 405 asserts legal arguments and conclusions of law, no response is required.

CAUSES OF ACTION

COUNT I: INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS **(ALL DEFENDANTS)**

406. Mr. Wenig reasserts his responses to Paragraphs 1 through 405 and incorporates by reference his responses to all other Paragraphs of the First Amended Complaint with the same legal force and effect as if fully set forth herein.

407. Paragraph 407 asserts legal arguments and conclusions of law, and no response is required.

408. Paragraph 408 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 408. Further, to the extent the allegations in Paragraph 408 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 408.

409. Paragraph 409 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 409.

410. Paragraph 410 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 410. Further, to the extent the allegations in Paragraph 410 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 410.

411. Paragraph 411 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 411.

412. Paragraph 412 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 412.

413. Paragraph 413 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 413.

414. Paragraph 414 asserts legal arguments and conclusions of law, and no response is required.

415. Paragraph 415 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 415. Further, to the extent the allegations in Paragraph 415 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 415.

416. Paragraph 416 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 416.

417. Paragraph 417 asserts legal arguments and conclusions of law, and no response is required.

418. Paragraph 418 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 418.

COUNT II: STALKING
(ALL DEFENDANTS)

419. Mr. Wenig reasserts his responses to Paragraphs 1 through 418 and incorporates by reference his responses to all other Paragraphs of the First Amended Complaint with the same legal force and effect as if fully set forth herein.

420. The allegations in Paragraph 420 pertain to claims dismissed in the Court's December 12, 2023 Order, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 420.

421. The allegations in Paragraph 421 pertain to claims dismissed in the Court's December 12, 2023 Order, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 421.

422. The allegations in Paragraph 422 pertain to claims dismissed in the Court's December 12, 2023 Order, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 422.

423. The allegations in Paragraph 423 pertain to claims dismissed in the Court's December 12, 2023 Order, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 423.

424. The allegations in Paragraph 424 pertain to claims dismissed in the Court's December 12, 2023 Order, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 424.

425. The allegations in Paragraph 425 pertain to claims dismissed in the Court's December 12, 2023 Order, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 425.

426. The allegations in Paragraph 426 pertain to claims dismissed in the Court's December 12, 2023 Order, and no response is required. Further, Paragraph 426 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 426.

427. The allegations in Paragraph 427 pertain to claims dismissed in the Court's December 12, 2023 Order, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 427.

428. The allegations in Paragraph 428 pertain to claims dismissed in the Court's December 12, 2023 Order, and no response is required. Further, Paragraph 428 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 428.

429. The allegations in Paragraph 429 pertain to claims dismissed in the Court's December 12, 2023 Order, and no response is required. Further, Paragraph 429 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 429.

430. The allegations in Paragraph 430 pertain to claims dismissed in the Court's December 12, 2023 Order, and no response is required. Further, Paragraph 430 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 430.

COUNT III: NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
(ALL DEFENDANTS)

431. Mr. Wenig reasserts his responses to Paragraphs 1 through 430 and incorporates by reference his responses to all other Paragraphs of the First Amended Complaint with the same legal force and effect as if fully set forth herein.

432. Paragraph 432 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 432.

433. Paragraph 433 asserts legal arguments and conclusions of law, and no response is required. Further, to the extent the allegations in Paragraph 433 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 433. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 433.

434. Paragraph 434 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 434.

435. Paragraph 435 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 435.

436. Paragraph 436 asserts legal arguments and conclusions of law, and no response is required. Further, to the extent the allegations in Paragraph 436 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 436. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 436.

437. Paragraph 437 asserts legal arguments and conclusions of law, and no response is required.

438. Paragraph 438 asserts legal arguments and conclusions of law, and no response is required. Further, to the extent the allegations in Paragraph 438 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 438. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 438.

COUNT IV: NEGLIGENCE
(ALL DEFENDANTS)

439. Mr. Wenig reasserts his responses to Paragraphs 1 through 438 and incorporates by reference his responses to all other Paragraphs of the First Amended Complaint with the same legal force and effect as if fully set forth herein.

440. Paragraph 440 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 440.

441. Paragraph 441 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 441.

442. Paragraph 442 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 442.

443. Paragraph 443 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 443.

444. Paragraph 444 asserts legal arguments and conclusions of law, and no response is required. Further, to the extent the allegations in Paragraph 444 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 444. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 444.

COUNT V: NEGLIGENT HIRING
(DEFENDANT EBAY)

445. Mr. Wenig reasserts his responses to Paragraphs 1 through 444 and incorporates by reference his responses to all other Paragraphs of the First Amended Complaint with the same legal force and effect as if fully set forth herein.

446. Paragraph 446 asserts legal arguments and conclusions of law, and no response is required. Further, Count V is not directed at Mr. Wenig and pertains to claims dismissed in the Court's December 12, 2023 Order, and so no response is required.

447. Paragraph 447 asserts legal arguments and conclusions of law, and no response is required. Further, Count V is not directed at Mr. Wenig and pertains to claims dismissed in the Court's December 12, 2023 Order, and so no response is required.

448. Paragraph 448 asserts legal arguments and conclusions of law, and no response is required. Further, Count V is not directed at Mr. Wenig and pertains to claims dismissed in the Court's December 12, 2023 Order, and so no response is required.

449. Paragraph 449 asserts legal arguments and conclusions of law, and no response is required. Further, Count V is not directed at Mr. Wenig and so no response is required.

450. Paragraph 450 asserts legal arguments and conclusions of law, and no response is required. Further, Count V is not directed at Mr. Wenig and pertains to claims dismissed in the Court's December 12, 2023 Order, and so no response is required.

451. Paragraph 451 asserts legal arguments and conclusions of law, and no response is required. Further, Count V is not directed at Mr. Wenig and pertains to claims dismissed in the Court's December 12, 2023 Order, and so no response is required.

452. Paragraph 452 asserts legal arguments and conclusions of law, and no response is required. Further, Count V is not directed at Mr. Wenig and pertains to claims dismissed in the Court's December 12, 2023 Order, and so no response is required.

453. Paragraph 453 asserts legal arguments and conclusions of law, and no response is required. Further, Count V is not directed at Mr. Wenig and pertains to claims dismissed in the Court's December 12, 2023 Order, and so no response is required.

COUNT VI: NEGLIGENT SUPERVISION
(DEFENDANTS EBAY, PFC, WENIG, JONES, AND KRYSTEK)

454. Mr. Wenig reasserts his responses to Paragraphs 1 through 453 and incorporates by reference his responses to all other Paragraphs of the First Amended Complaint with the same legal force and effect as if fully set forth herein.

455. Paragraph 455 asserts legal arguments and conclusions of law, and no response is required.

456. Paragraph 456 asserts legal arguments and conclusions of law, and no response is required.

457. Paragraph 457 asserts legal arguments and conclusions of law, and no response is required.

458. Mr. Wenig denies the allegations in Paragraph 458, to the extent they relate to him. Further, Paragraph 458 asserts legal arguments and conclusions of law, and no response is required. To the extent the allegations in Paragraph 458 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 458.

459. Mr. Wenig denies the allegations in Paragraph 459, to the extent they relate to him. Further, Paragraph 459 asserts legal arguments and conclusions of law, and no response is required. To the extent the allegations in Paragraph 459 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 459.

460. To the extent the allegations in Paragraph 460 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 460. To the extent the allegations relate to Mr. Weng, Mr. Wenig denies the allegations in Paragraph 460.

461. Paragraph 461 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 461. Further, to the extent the allegations in Paragraph 461 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 461.

462. Paragraph 462 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 462. Further, to the extent the allegations in Paragraph 462 relate to other parties or third-party

individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 462.

463. Paragraph 463 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 463. Further, to the extent the allegations in Paragraph 463 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 463.

464. Paragraph 464 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 464. Further, to the extent the allegations in Paragraph 464 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 464.

465. Paragraph 465 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 465. Further, to the extent the allegations in Paragraph 465 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 465.

466. Paragraph 466 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 466. Further, to the extent the allegations in Paragraph 466 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 466.

467. Paragraph 467 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 467. Further, to the extent the allegations in Paragraph 467 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 467.

468. Paragraph 468 asserts legal arguments and conclusions of law, and no response is required. Further, to the extent the allegations in Paragraph 468 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 468.

469. Paragraph 469 asserts legal arguments and conclusions of law, and no response is required. Further, to the extent the allegations in Paragraph 469 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 469.

470. Paragraph 470 asserts legal arguments and conclusions of law, and no response is required. Further, to the extent the allegations in Paragraph 470 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 470.

471. Paragraph 471 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 471.

COUNT VII: NEGLIGENT RETENTION
(DEFENDANTS EBAY AND PFC)

472. Mr. Wenig reasserts his responses to Paragraphs 1 through 471 and incorporates by reference his responses to all other Paragraphs of the First Amended Complaint with the same legal force and effect as if fully set forth herein.

473. Paragraph 473 asserts legal arguments and conclusions of law, and no response is required.

474. Paragraph 474 asserts legal arguments and conclusions of law, and no response is required. Further, Count VII is not directed at Mr. Wenig and so no response is required.

475. Paragraph 475 asserts legal arguments and conclusions of law, and no response is required. Further, Count VII is not directed at Mr. Wenig and so no response is required.

476. Paragraph 476 asserts legal arguments and conclusions of law, and no response is required. Further, Count VII is not directed at Mr. Wenig and so no response is required.

477. Paragraph 477 asserts legal arguments and conclusions of law, and no response is required. Further, Count VII is not directed at Mr. Wenig and so no response is required.

478. Paragraph 478 asserts legal arguments and conclusions of law, and no response is required. Further, Count VII is not directed at Mr. Wenig and so no response is required.

479. Paragraph 479 asserts legal arguments and conclusions of law, and no response is required. Further, Count VII is not directed at Mr. Wenig and so no response is required.

480. Paragraph 480 asserts legal arguments and conclusions of law, and no response is required. Further, Count VII is not directed at Mr. Wenig and so no response is required.

481. Paragraph 481 asserts legal arguments and conclusions of law, and no response is required. Further, Count VII is not directed at Mr. Wenig and so no response is required.

482. Paragraph 482 asserts legal arguments and conclusions of law, and no response is required. Further, Count VII is not directed at Mr. Wenig and so no response is required.

COUNT VIII: ASSAULT
(ALL DEFENDANTS)

483. Mr. Wenig reasserts his responses to Paragraphs 1 through 482 and incorporates by reference his responses to all other Paragraphs of the First Amended Complaint with the same legal force and effect as if fully set forth herein.

484. The allegations in Paragraph 484 pertain to claims dismissed in the Court's December 12, 2023 Order, and no response is required. Further, Paragraph 484 asserts legal arguments and conclusions of law, and no response is required.

485. The allegations in Paragraph 485 pertain to claims dismissed in the Court's December 12, 2023 Order, and no response is required. Further, Paragraph 485 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 485.

486. The allegations in Paragraph 486 pertain to claims dismissed in the Court's December 12, 2023 Order, and no response is required. Further, Paragraph 486 asserts legal arguments and conclusions of law, and no response is required.

487. The allegations in Paragraph 487 pertain to claims dismissed in the Court's December 12, 2023 Order, and no response is required. Further, Paragraph 487 asserts legal arguments and conclusions of law, and no response is required.

488. The allegations in Paragraph 488 pertain to claims dismissed in the Court's December 12, 2023 Order, and no response is required. Further, Paragraph 488 asserts legal arguments and conclusions of law, and no response is required.

489. The allegations in Paragraph 489 pertain to claims dismissed in the Court's December 12, 2023 Order, and no response is required. Further, Paragraph 489 asserts legal arguments and conclusions of law, and no response is required.

490. The allegations in Paragraph 490 pertain to claims dismissed in the Court's December 12, 2023 Order, and no response is required. Further, Paragraph 490 asserts legal arguments and conclusions of law, and no response is required.

491. The allegations in Paragraph 491 pertain to claims dismissed in the Court's December 12, 2023 Order, and no response is required. Further, Paragraph 491 asserts legal arguments and conclusions of law, and no response is required.

COUNT IX: VIOLATION OF TITLE II, CH. 12, § 11I
(MASSACHUSETTS CIVIL RIGHTS ACT VIOLATION)
(ALL DEFENDANTS)

492. Mr. Wenig reasserts his responses to Paragraphs 1 through 491 and incorporates by reference his responses to all other Paragraphs of the First Amended Complaint with the same legal force and effect as if fully set forth herein.

493. Mr. Wenig denies the allegations in Paragraph 493, to the extent they relate to him. Further, Paragraph 493 asserts legal arguments and conclusions of law, and no response is required. To the extent the allegations in Paragraph 493 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 493.

494. Mr. Wenig denies the allegations in Paragraph 494, to the extent they relate to him. The allegations in Paragraph 494 pertain to claims dismissed in the Court's December 12, 2023 Order, and no response is required. Further, Paragraph 494 asserts legal arguments and conclusions of law, and no response is required. To the extent the allegations in Paragraph 494 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 494.

495. Paragraph 495 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 495.

496. Paragraph 496 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 496.

497. The allegations in Paragraph 497 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 497. Further, Paragraph 497 asserts legal arguments and conclusions of law, and no response is required.

498. Paragraph 498 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 498.

COUNT X: DEFAMATION
(ALL DEFENDANTS)

499. Mr. Wenig reasserts his responses to Paragraphs 1 through 499 and incorporates by reference his responses to all other Paragraphs of the First Amended Complaint with the same legal force and effect as if fully set forth herein.

500. The allegations in Paragraph 500 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 500.

501. The allegations in Paragraph 501 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 501.

502. The allegations in Paragraph 502 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 502.

503. The allegations in Paragraph 503 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 503.

504. Mr. Wenig denies the allegations in Paragraph 504, to the extent they relate to him. Further, Paragraph 504 asserts legal arguments and conclusions of law, and no response is required. To the extent the allegations in Paragraph 504 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 504.

505. Mr. Wenig denies the allegations in Paragraph 505, to the extent they relate to him. Paragraph 505 asserts legal arguments and conclusions of law, and no response is required. To the extent the allegations in Paragraph 505 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 505.

506. Mr. Wenig denies the allegations in Paragraph 506, to the extent they relate to him. Paragraph 506 asserts legal arguments and conclusions of law, and no response is required. To the extent the allegations in Paragraph 506 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 506.

507. Mr. Wenig denies the allegations in Paragraph 507, to the extent they relate to him. Paragraph 507 asserts legal arguments and conclusions of law, and no response is required. To the extent the allegations in Paragraph 507 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 507.

508. Mr. Wenig denies the allegations in Paragraph 508, to the extent they relate to him. Paragraph 508 asserts legal arguments and conclusions of law, and no response is required. To the extent the allegations in Paragraph 508 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 508.

509. Mr. Wenig denies the allegations in Paragraph 509, to the extent they relate to him. Paragraph 509 asserts legal arguments and conclusions of law, and no response is required. To the extent the allegations in Paragraph 509 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 509.

510. Mr. Wenig denies the allegations in Paragraph 510, to the extent they relate to him. Paragraph 510 asserts legal arguments and conclusions of law, and no response is required. To the extent the allegations in Paragraph 510 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 510.

511. Mr. Wenig denies the allegations in Paragraph 511, to the extent they relate to him. Paragraph 511 asserts legal arguments and conclusions of law, and no response is required. To the extent the allegations in Paragraph 511 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 511.

512. Mr. Wenig denies the allegations in Paragraph 512, to the extent they relate to him. Paragraph 512 asserts legal arguments and conclusions of law, and no response is required. To the extent the allegations in Paragraph 512 relate to other parties or third-party individuals, Mr. Wenig

states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 512.

513. Paragraph 513 asserts legal arguments and conclusions of law, and no response is required. Further, Paragraph 513 relates to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 513.

514. Mr. Wenig denies the allegations in Paragraph 514, to the extent they relate to him. Paragraph 514 asserts legal arguments and conclusions of law, and no response is required. Further, to the extent Paragraph 514 relates to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 514.

515. Mr. Wenig denies the allegations in Paragraph 515, to the extent they relate to him. Paragraph 515 asserts legal arguments and conclusions of law, and no response is required. Further, to the extent Paragraph 515 relates to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 515.

516. Paragraph 516 asserts legal arguments and conclusions of law, and no response is required. Further, Paragraph 516 relates to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 516.

517. Paragraph 517 asserts legal arguments and conclusions of law, and no response is required. Further, Paragraph 517 relates to other parties or third-party individuals, and Mr. Wenig

states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 517.

518. Paragraph 518 asserts legal arguments and conclusions of law, and no response is required. To the extent that a response is required, Mr. Wenig denies the allegations in Paragraph 518.

519. Paragraph 519 asserts legal arguments and conclusions of law, and no response is required. Further, Paragraph 519 relates to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 519.

520. Paragraph 520 asserts legal arguments and conclusions of law, and no response is required. Further, Paragraph 520 relates to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 520.

521. Paragraph 521 asserts legal arguments and conclusions of law, and no response is required. To the extent that a response is required, Mr. Wenig denies the allegations in Paragraph 521.

522. Paragraph 522 asserts legal arguments and conclusions of law, and no response is required. To the extent that a response is required, Mr. Wenig denies the allegations in Paragraph 522.

COUNT XI: TRESPASS (PHYSICAL AND TRESPASS TO CHATTELS)
(ALL DEFENDANTS)

523. Mr. Wenig reasserts his responses to Paragraphs 1 through 522 and incorporates by reference his responses to all other Paragraphs of the First Amended Complaint with the same legal force and effect as if fully set forth herein.

524. Mr. Wenig denies the allegations in Paragraph 524, to the extent they relate to him. Paragraph 524 asserts legal arguments and conclusions of law, and no response is required. Further, to the extent Paragraph 524 relates to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 524.

525. Paragraph 525 asserts legal arguments and conclusions of law, and no response is required. Further, to the extent Paragraph 525 relates to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 525. To the extent Paragraph 525 relates to Mr. Wenig, Mr. Wenig denies the allegations in Paragraph 525.

526. Mr. Wenig denies the allegations in Paragraph 526, to the extent they relate to him. Paragraph 526 asserts legal arguments and conclusions of law, and no response is required. Further, to the extent Paragraph 526 relates to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 526.

527. Paragraph 527 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 527.

528. Mr. Wenig denies the allegations in Paragraph 528, to the extent they relate to him. Paragraph 528 asserts legal arguments and conclusions of law, and no response is required. Further, to the extent Paragraph 528 relates to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 528.

529. Paragraph 529 asserts legal arguments and conclusions of law, and no response is required. Further, Paragraph 529 relates to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 529.

530. Mr. Wenig denies the allegations in Paragraph 530, to the extent they relate to him. Paragraph 530 asserts legal arguments and conclusions of law, and no response is required. Further, to the extent Paragraph 530 relates to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 530.

531. Paragraph 531 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 531.

COUNT XII: FALSE IMPRISONMENT

532. Mr. Wenig reasserts his responses to Paragraphs 1 through 531 and incorporates by reference his responses to all other Paragraphs of the First Amended Complaint with the same legal force and effect as if fully set forth herein.

533. Paragraph 533 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 533.

534. Mr. Wenig denies the allegations in Paragraph 534, to the extent they relate to him. Paragraph 534 asserts legal arguments and conclusions of law, and no response is required. Further, to the extent Paragraph 534 relates to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 534.

535. Paragraph 535 relates to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 535.

536. Paragraph 536 relates to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 536.

537. Mr. Wenig denies the allegations in Paragraph 537, to the extent they relate to him. Paragraph 537 asserts legal arguments and conclusions of law, and no response is required. Further, to the extent Paragraph 537 relates to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 537.

538. Paragraph 538 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 538.

539. Paragraph 539 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 539.

540. Paragraph 540 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 540.

541. Mr. Wenig denies the allegations in Paragraph 541, to the extent they relate to him. Paragraph 541 asserts legal arguments and conclusions of law, and no response is required. Further, to the extent Paragraph 541 relates to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 541.

542. Paragraph 542 asserts legal arguments and conclusions of law, and no response is required. Further, Paragraph 542 relates to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 542.

543. Mr. Wenig denies the allegations in Paragraph 543, to the extent they relate to him. Paragraph 543 asserts legal arguments and conclusions of law, and no response is required. Further, to the extent Paragraph 543 relates to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 543.

544. Paragraph 544 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 544.

COUNT XIII: CIVIL CONSPIRACY
(ALL DEFENDANTS)

545. Mr. Wenig reasserts his responses to Paragraphs 1 through 544 and incorporates by reference his responses to all other Paragraphs of the First Amended Complaint with the same legal force and effect as if fully set forth herein.

546. Mr. Wenig denies the allegations in Paragraph 546, to the extent they relate to him. To the extent the allegations in Paragraph 546 relate to claims dismissed in the Court's December 12, 2023 Order, no response is required. Further, Paragraph 546 asserts legal arguments and conclusions of law, and no response is required. To the extent the allegations in Paragraph 546 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 546.

547. Mr. Wenig denies the allegations in Paragraph 547, to the extent they relate to him. The allegations in Paragraph 547 relate to claims dismissed in the Court's December 12, 2023

Order, and no response is required. Further, Paragraph 547 asserts legal arguments and conclusions of law, and no response is required. To the extent the allegations in Paragraph 547 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 547.

548. Mr. Wenig denies the allegations in Paragraph 548, to the extent they relate to him. Paragraph 548 asserts legal arguments and conclusions of law, and no response is required. To the extent the allegations in Paragraph 548 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 548.

549. Mr. Wenig denies the allegations in Paragraph 549, to the extent they relate to him. Paragraph 549 asserts legal arguments and conclusions of law, and no response is required. To the extent the allegations in Paragraph 549 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 549.

550. Mr. Wenig denies the allegations in Paragraph 550, to the extent they relate to him. Paragraph 550 asserts legal arguments and conclusions of law, and no response is required. To the extent the allegations in Paragraph 550 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 550.

551. Mr. Wenig denies the allegations in Paragraph 551, to the extent they relate to him. Paragraph 551 asserts legal arguments and conclusions of law, and no response is required. To the extent the allegations in Paragraph 551 relate to other parties or third-party individuals, Mr. Wenig

states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 551.

552. Mr. Wenig denies the allegations in Paragraph 552, to the extent they relate to him. Paragraph 552 asserts legal arguments and conclusions of law, and no response is required. To the extent the allegations in Paragraph 552 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 552.

553. Mr. Wenig denies the allegations in Paragraph 553, to the extent they relate to him. Paragraph 553 asserts legal arguments and conclusions of law, and no response is required. Further, to the extent the allegations in Paragraph 553 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 553.

554. Mr. Wenig denies the allegations in Paragraph 554, to the extent they relate to him. Paragraph 554 asserts legal arguments and conclusions of law, and no response is required. To the extent the allegations in Paragraph 554 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 554.

555. Paragraph 555 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 555.

COUNT XIV: RATIFICATION
(DEFENDANT EBAY)

556. Mr. Wenig reasserts his responses to Paragraphs 1 through 555 and incorporates by reference his responses to all other Paragraphs of the First Amended Complaint with the same legal force and effect as if fully set forth herein.

557. Mr. Wenig admits that he was formerly eBay's Chief Executive Officer, Steve Wymer was eBay's former Senior Vice President and Chief Communications Officer, Wendy Jones was eBay's former Senior Vice President of Global Operations, and that Jim Baugh was eBay's former Senior Director of Safety & Security. executive officers at eBay. allegations in Paragraph 557. The remaining allegations in Paragraph 557 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 557.

558. Paragraph 558 asserts legal arguments and conclusions of law, and no response is required.

559. Mr. Wenig denies the allegations in Paragraph 559, to the extent they relate to him. Paragraph 559 asserts legal arguments and conclusions of law, and no response is required. To the extent the allegations in Paragraph 559 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 559.

560. Mr. Wenig denies the allegations in Paragraph 560, to the extent they relate to him. Paragraph 560 asserts legal arguments and conclusions of law, and no response is required. To the extent the allegations in Paragraph 560 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 560. Further, to the extent the allegations in Paragraph 560 are based on documents, those documents speak for themselves and all characterizations thereof are denied.

561. Mr. Wenig denies the allegations in Paragraph 561 to the extent they relate to him, except he admits that he resigned from eBay. To the extent the allegations in Paragraph 561 are based on a document or a "Separation Agreement," that document speaks for itself and all

characterizations thereof are denied. Paragraph 561 asserts legal arguments and conclusions of law, and no response is required. To the extent the allegations in Paragraph 561 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 561.

562. The allegations in Paragraph 562 relate to other parties or third-party individuals, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 562.

563. Mr. Wenig denies the allegations in Paragraph 563, to the extent they relate to him. Paragraph 563 asserts legal arguments and conclusions of law, and no response is required. To the extent the allegations in Paragraph 563 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 563.

564. Mr. Wenig denies the allegations in Paragraph 564, to the extent they relate to him. To the extent the allegations in Paragraph 564 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 564. Further, to the extent that the allegations in Paragraph 564 are based on a document, that document speaks for itself and all characterizations thereof are denied.

565. Mr. Wenig admits that Morgan Lewis, retained by eBay, conducted an investigation into the events involving Plaintiffs. The allegations in Paragraph 565 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 565.

566. Mr. Wenig admits that Morgan Lewis, retained by eBay, conducted an investigation into the events involving Plaintiffs. The remaining allegations in Paragraph 566 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 566.

567. The allegations in Paragraph 567 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 567. To the extent the allegations in Paragraph 567 are based on documents, those documents speak for themselves and all characterizations thereof are denied.

568. Mr. Wenig admits that Morgan Lewis, retained by eBay, conducted an investigation into the events involving Plaintiffs. The remaining allegations in Paragraph 568 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 568. To the extent the allegations in Paragraph 568 are based on documents, those documents speak for themselves and all characterizations thereof are denied.

569. Mr. Wenig admits that Morgan Lewis, retained by eBay, conducted an investigation into the events involving Plaintiffs. The remaining allegations in Paragraph 569 relate to other parties or third-party individuals, or are based on news articles or criminal proceedings, and Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 569.

570. Mr. Wenig admits that he has an indemnification agreement with eBay, which agreement speaks for itself, and all characterizations thereof are denied. To the extent the

allegations in Paragraph 570 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 570.

571. Paragraph 571 asserts legal arguments and conclusions of law, and no response is required. To the extent a response is required, Mr. Wenig denies the allegations in Paragraph 571.

572. Paragraph 572 asserts legal arguments and conclusions of law, and no response is required. Further, to the extent the allegations in Paragraph 572 relate to other parties or third-party individuals, Mr. Wenig states that he is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 572.

PRAYER FOR RELIEF

Mr. Wenig admits that Plaintiffs are seeking the relief identified in the “WHEREFORE” paragraph of the First Amended Complaint, including its subparts, but denies that Plaintiffs are entitled to any relief.

AFFIRMATIVE AND OTHER DEFENSES

Discovery and investigation may reveal that one or more of the following defenses are available to Mr. Wenig in this matter. Thus, Mr. Wenig reserves the right to assert these separate defenses. If the facts warrant, Mr. Wenig may withdraw any of these defenses. Mr. Wenig further reserves the right to modify, clarify, amend, or supplement the Answer and Affirmative Defenses, and to assert additional defenses and other claims, as discovery proceeds. By way of defense, and without assuming the burden of proof for such defenses it would otherwise not have the burden to prove, Mr. Wenig hereby asserts the following affirmative defenses to Plaintiffs’ First Amended Complaint.

First Affirmative Defense

The First Amended Complaint fails to state a claim against Mr. Wenig upon which relief may be granted.

Second Affirmative Defense

The First Amended Complaint fails to state a claim because the allegations constitute an improper group pleading, which fails to place Mr. Wenig on notice as to what specific conduct is attributed to him, and when and how such conduct occurred.

Third Affirmative Defense

The relief requested in the Statement of Claim should be denied, in whole or in part, based on Claimant's failure to make reasonable efforts to mitigate their damages, if any.

Fourth Affirmative Defense

The First Amended Complaint fails to state a claim against Mr. Wenig under the Massachusetts Civil Rights Act upon which relief may be granted because, among other things, it does not show that he interfered with Plaintiffs' exercise of a protected right, and that the interference was accomplished through threats, intimidation, or coercion by him.

Fifth Affirmative Defense

The First Amended Complaint fails to state a claim against Mr. Wenig for defamation upon which relief may be granted because, among other things, it does not show that he published a false and defamatory statement concerning Plaintiffs.

Sixth Affirmative Defense

The First Amended Complaint fails to state a claim against Mr. Wenig for false imprisonment upon which relief may be granted because, among other things, it does not allege that he unlawfully restrained Plaintiffs' movements.

Seventh Affirmative Defense

The First Amended Complaint fails to state a claim against Mr. Wenig because he did not have the requisite mental state.

Eighth Affirmative Defense

Plaintiffs' claims are barred, in whole or in part, because the claims alleged were proximately caused by, occurred, and/or were contributed to by others. Mr. Wenig's acts or omissions were not the cause in fact or proximate cause of any injury that Plaintiffs claim.

Ninth Affirmative Defense

Mr. Wenig reserves the right to raise all additional defenses that may become available to him during the pendency of the above-captioned action.

General Denial

Mr. Wenig denies any allegations of the First Amended Complaint that are not specifically admitted above.

DEMAND FOR A JURY TRIAL

Mr. Wenig hereby demands a trial by jury on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Mr. Wenig requests that the Court dismiss with prejudice all Plaintiffs' claims in the First Amended Complaint against Mr. Wenig, deny all relief Plaintiffs' request that is not authorized by law, and award Mr. Wenig any further relief as the Court deems just and proper.

Dated: January 12, 2024

By: /s/ Abbe David Lowell
Abbe David Lowell (*pro hac vice*)

WINSTON & STRAWN LLP
1901 L Street, NW
Washington, DC 20036
adlowell@winston.com
atauber@winston.com
(202) 282-5000

Martin G. Weinberg, Esq.
Martin G. Weinberg PC
20 Park Plaza
Suite 1000
Boston, MA 02116
owlmgw@att.net
(617) 227-3700

Counsel for Devin Wenig

CERTIFICATE OF SERVICE

I certify that on January 12, 2024, this pleading was filed with United States District Court for the District of Massachusetts using the CM/ECF system, and was served on all participating counsel and *pro se* defendant Stephanie Stockwell via email and FedEx.

Dated: January 12, 2024

By: /s/ Abbe David Lowell